

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES

VS

KIRK RINALDI

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NO. 03-CR-10385-RGS

MOTION TO CONTINUE TRIAL DATE

The defendant, Kirk Rinaldi, moves to continue the trial date of his case from February 27, 2006, to a date sometime after the completion of the trial in which AUSA Christopher F. Bator is presently engaged for the following reasons:

Defense counsel recently completed a two-week trial and needs additional time to prepare for the trial in this case, and to discuss a possible resolution precluding the need for a trial.

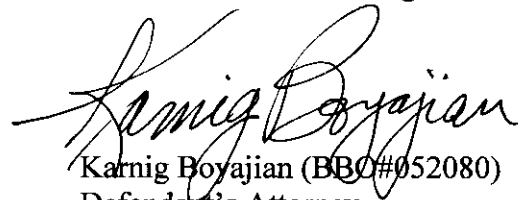
The government attorney is presently engaged in trial (U.S. v. DeCologero et al, No. 01-10373-RWZ) that is expected to last a considerable period of weeks.

The parties have agreed that the within case should be continued to a future indefinite date at which time government counsel will inform the court when his case has been concluded, at which time a request will also be made that the within case be set down for a further status conference to more accurately determine a fixed trial date.

The defendant agrees that the time between his last appearance in court to the present may be excluded from the time standards in effect regarding this case.


The government has granted its telephone assent to this motion to the undersigned.

February 24, 2006



Karnig Boyajian (BBO#052080)
Defendant's Attorney
One Gateway Center, Suite 315
Newton, MA 02458
Tel. 617-332-222
Fax. 617-332-2221

Assented to:

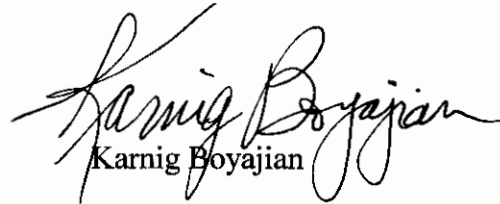

Christopher F. Bator, AUSA

(Kb)

CERTIFICATE

I hereby certify a copy of the within motion was this date delivered, faxed and/or mailed postage prepaid to AUSA Christopher Bator, c/o U.S. Attorney's Office, One Courthouse Way, Suite 9200, Boston, MA, 02110.

February 24, 2006



Karnig Boyajian